

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN**

**VERSAPRO GROUP, LLC,**

Plaintiff,

Case No.: 2:18-cv-13120-AJT-DRG  
Hon. Arthur J. Tarnow

v.

**LINTECH GLOBAL, INC.,**

Defendant.

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**DEFENDANT’S UNOPPOSED MOTION FOR LEAVE TO FILE  
UNDER SEAL**

Defendant, LinTech Global, Inc. (“LinTech”), by and through its counsel, McDonald Hopkins PLC, hereby moves under E.D. Mich. Local Rule 5.3(b), for an order permitting LinTech to redact from its Motion to Dismiss and/or Compel Arbitration (the “Motion”) citations to certain confidential and trade secret information and the supporting exhibits thereto, and to file the unredacted version of the Motion under seal. A redacted version of the Motion is attached hereto as Exhibit 1. Lintech states the following in support of this Motion for Leave to File Under Seal:

1. Lintech desires to file the Motion as its first responsive pleading on account that the applicable contracts that govern the issues in this lawsuit contain mandatory arbitration provisions.

2. The contracts at issue in this lawsuit (which are attachments A, B, C, and D of the Motion) (the “Contracts”) contain negotiated, highly confidential and trade secret information that pertain to Lintech’s supply of information technology services in support of certain government defense industry programs between the Plaintiff and Defendant.

3. The Motion, itself, contains references to the Contracts.

4. It is necessary for the Court to review the Contracts to rule on Lintech’s Motion.

5. A protective order has not yet been entered in this case, as this lawsuit was only just filed on October 5, 2018 and the Motion is intended to be Lintech’s first responsive pleading.

6. Courts routinely recognize the trade secret information is confidential. *See e.g., Electronic Planroom, Inc. v. McGraw-Hill Companies, Inc.*, 135 F.Supp.2d 805 (E.D. Mich. 2003).

7. If Lintech were required to publicly disclose the information in the Contracts, it would be disclosing its confidential and trade secret information and would cause irreparable harm.

8. The public does not have access or a right to this information. Accordingly, no third-party will be harmed by Lintech filing the Motion under seal.

9. No means other than sealing the Motion is available or satisfactory to preserve Lintech's confidential and proprietary information.

10. Lintech redacted the publicly filed Motion, as well as each of the Contracts, so as to remove all confidential and proprietary information referenced in the Contracts.

11. Lintech has sent opposing counsel an unredacted copy of the Motion. Lintech has also filed an unredacted copy of the Motion under seal as Exhibit 2, in accordance with L.R. 5.3(b)(3)(A)(vi).

12. In accordance with L.R. 7.1(a), Lintech's counsel contacted Plaintiff's counsel with regard to this Motion for Leave to File Under Seal and Plaintiff does not oppose the relief requested herein.

WHEREFORE, Lintech respectfully requests that the Court enter the proposed order (attached as Exhibit 3) granting the instant Motion for Leave to File Under Seal.

Respectfully submitted,

MCDONALD HOPKINS PLC

By: /s/James J. Boutrous II  
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Dated: November 1, 2018

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**DEFENDANT’S BRIEF IN SUPPORT OF ITS UNOPPOSED MOTION  
FOR LEAVE TO FILE UNDER SEAL**

In support of its Motion for Leave to File Under Seal, Defendant, LinTech Global, Inc. (“LinTech”), rely on E.D. Mich. Local Rule 5.3(b)(2) and the facts and argument in its Motion.

WHEREFORE, Lintech respectfully requests that the Court enter the proposed order (attached as Exhibit 3) granting the instant Motion for Leave to File Under Seal.

Respectfully submitted,

McDONALD HOPKINS PLC

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*Attorneys for Defendant*

Dated: November 1, 2018

**CERTIFICATE OF SERVICE**

I hereby certify that on November 1, 2018, I electronically filed the foregoing paper with the Clerk of the Court using the E-Filing System which will send notification of such filing to all counsel of record.

Respectfully submitted,

MCDONALD HOPKINS PLC

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